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ABSTRACT

Although state and federal early care and education administrators have been encouraging providers to form partnerships to develop full-day, full-year service options in response to families' changing needs, regulatory differences have hampered the success of such partnerships. This report presents the recommendations of the Collaborative Partners Work Group (CPWG), a group of California Head Start and state-funded early care and education program administrators, federal program staff, and state program staff convened to assist programs considering full-day, full-year partnerships. Beginning with messages from the Administration for Children and Families and the California Department of Education, the report identifies four challenges for partnerships related to partners' income eligibility differences, class size requirements, staff qualifications, and length of program eligibility. The report next presents guiding principles for full-day, full-year partnerships and describes three partnership models (Head Start partnered with state preschools, general child care programs, or family child care home networks), including information on staffing ratios and staff education requirements, and strengths and challenges presented by each model. Examples illustrate possible implementation strategies for each of the program models. Cost allocation and enhancement are two acceptable fiscal approaches described in the report. The report then summarizes selected federal and state fiscal requirements and other guidance applicable to collaboration. The report concludes with a list of technical assistance resources. Three appendices include further guidance and clarification related to income eligibility, funding and partnership opportunities, and answers to common questions about full-day, full-year partnerships. (KB)

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Full-Day, Full-Year Early Care and Education Partnerships

Recommendations of the Collaborative Partners Work Group

Child Development Division
California Department of Education
Sacramento, 2002

ED 477 432

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Full-Day, Full-Year Early Care and Education Partnerships

Recommendations of the Collaborative Partners Work Group

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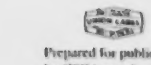
The guidance in *Full-Day, Full-Year Early Care and Education Partnerships—Recommendations of the Collaborative Partners Work Group* is not binding on local educational agencies or other entities. Except for the statutes, regulations, and court decisions that are referenced herein, the document is exemplary, and compliance with it is not mandatory. (See *Education Code* Section 33308.5.)



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A Message from the Administration for Children and Families

The Administration for Children and Families (ACF), Children and Youth Development Unit, administers the Head Start and Early Head Start programs in California and the other states and outer Pacific islands that compose ACF Region IX. We promote the national goal of school readiness for children through comprehensive, quality-oriented programs focusing on the entire family.

In support of our programs needing full-day, full-year services for working parents and those who are in training, ACF Region IX and the California Department of Education's Child Development Division (CDD) and its Head Start–State Collaboration Office have collaborated on this report to better facilitate and promote the joint use of Head Start and state CDD funds in serving California's eligible children and families. This report provides guidance for our respective programs in furthering collaborative arrangements and partnerships while illustrating ways to allocate costs in a reasonable and appropriate manner. We appreciate the work of our state colleagues—and their coordination with us—in this endeavor.

Terry Romey

for JAN LEN
Director, Children and Youth Development Unit

A Message from the California Department of Education, Child Development Division

The California Department of Education's Child Development Division (CDD) provides leadership and support to all individuals and organizations concerned with children and families by promoting high-quality child development programs.

One of our significant and enduring partnerships has been with Head Start. The Collaborative Partners Work Group, composed of local Head Start and CDD program administrators together with federal and state staff, is to be commended for its efforts that have resulted in this report.

The report provides programmatic and fiscal guidance to those engaged in or contemplating local partnerships between Head Start and CDD-funded programs. We hope you will find it useful.

Michael Jett

MICHAEL JETT
Director, Child Development Division

Executive Summary

The demand for full-day, full-year early care and education services has exploded in California, as it has across the rest of the nation, because of welfare reform and other cultural changes. More than 60 percent of two-parent families with young children now have both parents working full-time. And many more single parents with very young children now work as a result of welfare reform.

In response to the changing needs of families, state and federal early care and education administrators have been encouraging providers nationwide to form partnerships to develop full-day, full-year service options. However, regulatory differences in child and family eligibility, class size and staff-to-child ratios, funding for staff education, and other state and federal requirements have hampered the success of such partnerships.

In California a group of Head Start and state-funded early care and education program administrators, federal program staff, and state program staff were brought together by the California Department of Education's Child Development Division, assisted by the California Head Start–State Collaboration Office, to form the Collaborative Partners Work Group (CPWG) to develop guidance for local program providers contemplating entering into full-day, full-year partnerships. Most of the local administrators represented by the CPWG have been engaged in collaborations for several years, either with partner agencies or by virtue of their agency being a Head Start grantee as well as a state contractor.

The CPWG determined that, while challenges to collaborations between state-funded early education programs and Head Start do exist, they are not insurmountable. The CPWG agreed to identify and describe workable options for achieving full-day, full-year services through partnerships at the local level.

The CPWG reached consensus on guiding principles for all full-day, full-year partnerships, as follows:

- ◊ Partnerships enhance—rather than supplant—existing services.
- ◊ Partnerships have defensible fiscal systems, including a method of cost allocation/cost sharing.
- ◊ The program provides comprehensive services to children and families per Head Start performance standards and in accordance with the needs of families for full-day, full-year services.
- ◊ The program day appropriately meets the developmental needs of children.

- Partnerships ensure that state *and* federal requirements are met. When federal and state rules or regulations differ, programs adopt the more stringent standard.
- Children are in publicly subsidized full-day settings when the family requires and is eligible for full-day care. Part-day, part-year programs continue to be the appropriate option for families who do not need full-day services.

This report includes a matrix that describes three primary program models currently in use in various communities: Head Start partnering with State Preschool; Head Start partnering with General Child Care; and Head Start partnering with Family Child Care Home Networks. Descriptions of the models follow the matrix and include strengths and challenges as well as specific recommendations. A section on fiscal guidance and a listing of technical assistance resources are also provided.

Introduction

To determine how to reduce the barriers to full-day, full-year partnerships between state child development contractors and Head Start, and to develop recommendations on acceptable partnership models, the California Department of Education's Child Development Division (CDD) created the Collaborative Partners Work Group (CPWG). The work group's membership included representatives from the California Head Start Association; CDD-funded early care and education programs; staff from the U.S. Department of Health and Human Services, Region IX; and CDD. A list of CPWG members can be found on pages iv and v. Meetings were facilitated by the California Head Start–State Collaboration Office (CHSSCO), which was also responsible for developing this document.

The specific charge to the CPWG by CDD was to carry out the following:

> Provide guidance to California's early care and education system regarding acceptable full-day, full-year partnership models. Create a list of actions/changes needed to eliminate barriers to these models. Emphasize access, affordability, and quality between CDD-funded programs and a variety of public and private programs and funding sources, such as Head Start and Families First.

The CPWG began meeting in December 1999. Over the course of its meetings, the CPWG decided to focus on three specific types of collaboration between Head Start and CDD-funded programs: Head Start and State Preschool programs; Head Start and General Child Care programs; and Head Start and Family Child Care Home Network programs. Consensus was reached on a number of recommendations regarding these types of collaborations, which are reflected in the model descriptions in the report. The CPWG decided against making specific recommendations on partnerships between Alternative Payment Programs and Head Start because the use of voucher funds is not considered a "partnership," but rather a transactional relationship. The group also decided that addressing programs of the state and county Children and Families Commissions (referred to in the charge to CPWG as "Families First") was beyond the group's scope because the multiplicity of activities among those various commissions and the differences among county commissions were exceedingly complex.

The CPWG developed a list of strengths and challenges for each of the partnership models examined. Solutions for several of the challenges have been identified. Of those that remain, the

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following are the most significant and should be considered by programs considering whether to collaborate:

Challenge 1:
Income Eligibility Differences

Head Start income eligibility guidelines are tied to the U.S. Census Bureau poverty level ($17,650 for a family of four, based on 2001 data), while state income eligibility is based on a percentage of the state median income ($37,644 for a family of four, based on 2000-01 data). In California the problem is exacerbated because the state's minimum wage is higher than the federal minimum wage. Consequently, a parent working full-time at the minimum wage level in California exceeds the federal poverty ceiling.

- ◊ *Recommendation and CPWG action: Clarify to the field that families receiving support from the federal Temporary Assistance for Needy Families program retain eligibility for Head Start regardless of income.* The CPWG requested that the Region IX office clarify the definition of *public assistance* in the Administration for Children and Families (ACF) Information Memorandum 99-06, which was subject to varying interpretations in the field. The Region IX office responded to this request by developing and disseminating a letter of clarification to California's grantees. The letter, which appears in Appendix A of this report, confirmed that families served under CalWORKs in any of the CalWORKs "stages" meet the definition of public assistance in ACF 99-06 and may, therefore, exceed the Head Start income limits without jeopardizing their eligibility for Head Start services.
- ◊ *Recommendation: Raise the Head Start 10-percent-over-income limit.* Federal policymakers still hear of unserved eligible families, and may be hesitant to raise income levels when lower-income families are still in need of services. Policymakers should be helped to understand that several distinct populations exist within Head Start: families who still need part-day services; families who need full-day, full-year services because of welfare reform; and working poor families (not connected to welfare) who have always needed full-day, full-year services.
- ◊ *Recommendation: Change the federal statute in order to permit California's state income guidelines to be followed in collaborative projects.* This change is considered to be unlikely before reauthorization of the Head Start Act, unless language is added to another piece of legislation.

Challenge 2:
Class Size

Class size is an important Head Start criterion. Currently class size may not exceed 20 children. State programs place a greater emphasis on the significance of teacher-child ratios. These ratios, when combined with the state funding model, make a preferred class size of 24 children. Members of the CPWG met with Region IX staff to discuss options.

- ◊ *Recommendation: Partnerships may use Head Start funds to offset lost revenue resulting from limiting classes to a smaller size.* Region IX staff noted that Head Start programs may use Head Start quality funds to offset the loss of revenue from reducing class size to Head Start maximums.
- ◊ *Recommendation: Request a federal waiver of the Head Start class size limits for partnerships.* This proposed option was explored with ACF by CDD and the CPWG; however, obtaining a waiver of Head Start class-size regulations is not likely at this time.

Challenge 3:
Staff Qualifications

Minimum education requirements for staff in state-funded programs differ from the requirements of Head Start. They

also differ among state-funded programs, depending on whether a program must meet the requirements of Title 5 or Title 22 of the *California Code of Regulations.* However, the significance of this challenge may not be great for some grantees, considering the Head Start requirement that 50 percent of teachers hold a bachelor's or associate's degree by the year 2003.

◊ Group consensus: Resolving this challenge will not be addressed unless or until the early care and education community in California decides that a statutory change is desired.

Challenge 4:
Length of State Early Care and Education Eligibility vs. Head Start Eligibility

State Preschool and General Child Care-funded children are certified for one year. In contrast, once certified, Head Start children may continue in the program until kindergarten with a few exceptions.

◊ *Group consensus:* This challenge is not one for Head Start and GCC partnerships to address. Given the nature of these programs, this discrepancy is often appropriate. For example, Head Start children, while eligible for Head Start for two years, are not to be enrolled in full-day, full-year partnership programs unless their families have a need for a full-time program, based on the parents' being employed, seeking employment, or participating in training. If families' needs change, the children should be transferred to part-day services.

Notwithstanding the above, the yearly eligibility redetermination *may be* a problem for collaborations between Head Start and State Preschool programs. Children enrolled in State Preschool at age three may lose their "slot" in the second year if children from lower-income families apply for services, causing families who have been receiving full-day, full-year services while working to lose the full-day services they require.

◊ *Recommendation and CPWG action:* Notwithstanding *Education Code* Section 8237, the CPWG recommends, in order to promote school readiness, that CDD seek legislation that permits otherwise eligible three-year-old children to remain in State Preschool for a second year if the children are in a collaborative program with Head Start.

◊ *Another possible solution:* The 2001 document *Braided Funding—Frequently Asked Questions and Answers* (Region VIII Quality Improvement Center) contains the following question: "If a child in a braided-funding situation becomes ineligible for a child care subsidy, can the Head Start grant pick up the costs to allow the child to remain in the full-day, year-round classroom program?" The response given includes the following: "If the child is otherwise eligible for Head Start and is or can be enrolled in the Head Start program, the Head Start grantee can pick up the costs for that child to remain in the full-day, year-round program. If the child is not eligible for Head Start or cannot be included in the 10-percent-over-income category, then he or she would no longer be allowed to remain in the program."

Guiding Principles for Full-Day, Full-Year Partnerships

The CPWG reached consensus on guiding principles, also described as a "minimum bar," that each collaboration must meet in order to be recommended as acceptable for all full-day, full-year options:

- It is important that programs interested in collaboration learn as much as possible about their potential partner's program, funding, rules and regulations, and agency "culture" prior to finalizing partnerships.
- Partnerships enhance, rather than supplant, existing services.
- Partnerships have defensible fiscal systems, including a method of cost allocation/cost sharing that must enhance, not supplant, existing services. Partners who are braiding or blending funds have a cost-allocation plan that meets federal requirements per Head Start guidance and state contract requirements.
- The program provides comprehensive services to children and families in accordance with Head Start performance standards and meets the needs of families for full-day, full-year services. The program's daily plans appropriately meet the developmental needs of the children.
- Partnerships ensure that state and federal requirements are met. When federal and state rules or regulations differ, programs adopt the more stringent standard.
- Children are in publicly subsidized, full-day settings when their families need and are eligible for full-day care. Part-day, part-year programs continue to be the appropriate option for families who do not need full-day services.
- **Full-day** is defined as a minimum of 6 ½ hours per day, plus additional hours as needed by individual families.

  Full-year is defined as a program year that meets the needs of the population and community being served. Generally, this means a 12-month program that operates on at least 246 days. In some communities the full-year needs of families may be less than 12 months. For example, a program whose families are in a training program that operates 180 days during the program year and for whom 12 months of service are not required because the parents are available to care for their children for the remainder of the year could be considered a full-year program. (*Note:* This program-year definition does not necessarily correspond to Head Start or state program definitions that apply to program operations.)

Full-Day, Full-Year Partnership Models Using Funding from Head Start and the California Department of Education's Child Development Division

The chart presented on the following pages presents several possible combinations of Head Start and Child Development Division programs, each of which is currently being offered by one or more agencies represented by members of the Collaborative Partners Work Group (CPWG). Each model description includes information on staffing ratios and staff education requirements. Also included are some of the strengths and challenges presented by each model, as determined by the CPWG.

Programs in communities that are considering any of these models for partnering to provide full-day, full-year early care and education services should ask themselves the following questions:

- Programmatic: What is best for the children and what is best for the families in our community?
- Curricular: Have we created a developmentally appropriate, full-day curriculum that meets the needs of children and families, and do we meet the programmatic and staffing requirements of all funding sources?
- Fiscal: Do we have a defensible fiscal system that includes, if required, an approvable cost-allocation plan?

After answering these questions, program staff should then look for a model that addresses their answers.

Program Models

Head Start (HS) and State Preschool (SP) Partnership	*Head Start (HS) and General Child Care (GCC) Partnership*	*Head Start (HS) and Family Child Care Home (FCCH) Network Partnership*
Program Description • SP typically operates half-days for a traditional academic year (175 days). HS operates half-days for 175 days. This partnership may fully meet the needs of parents in the community. • Options for longer day and/or year, if needed, include additional funding from HS or from other resources (Proposition 10, voucher, other public or private funding source). • Parents require more than part-day services in order to work, attend training, or engage in other essential activities authorized by statute. • Families enrolled in both HS and SP must be eligible for both. • Class size is 20 children, with 3 adults per group. • Staff meet *CCR*, Title 5, requirements during SP hours. • A developmentally appropriate curriculum is in place throughout the day, with a variety of individual, small-group, and large-group activities planned for both morning and afternoon, with meals, snacks, and rest (nap) time. • All dually enrolled children receive Head Start comprehensive services. (Children enrolled in SP only are not eligible for HS comprehensive services.) • Parents of all dually enrolled children may participate in and/or be represented on the Head Start Policy Council and may serve on the State Parent Advisory Committee. (These two entities may be combined.)	**Program Description** • GCC provides funding for full-day, full-year program with HS, providing an "umbrella" of comprehensive and additional services. • Parents must meet eligibility criteria and need criteria of GCC. • Families enrolled in both HS and GCC must be eligible for both. • Class size is 20 children, with 3 adults per group. • Staff must meet *CCR*, Title 5, requirements. • A developmentally appropriate curriculum is in place throughout the day, with a variety of individual, small-group, and large-group activities planned for both morning and afternoon, with breakfast, lunch, snacks, and rest (nap) time. • All children receive HS comprehensive services. • All parents may participate in and/or be represented on the Head Start Policy Council and may serve on the State Parent Advisory Committee. (These two entities may be combined.)	**Program Description** • FCCH Network provides funding for full-day, full-year program with HS, providing an "umbrella" of comprehensive and additional services. HS infuses services into an FCCH through staff visits and training. HS may provide on-site training for providers, HS home visitors, assessments, screenings, and so forth. • Families enrolled in both HS and FCCH must be eligible for both. • Enrollment is based on licensed capacity of FCCH. • Program director of FCCH Network must meet *CCR*, Title 5, requirements. • A developmentally appropriate curriculum is in place throughout the day, with a variety of individual, small-group, and large-group activities planned for both morning and afternoon, with breakfast, lunch, snacks, and rest (nap) time. • All children receive HS comprehensive services. • All parents may participate in and/or be represented on the Head Start Policy Council and may serve on the State Parent Advisory Committee. (These two entities may be combined.)

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Head Start (HS) and State Preschool (SP) Partnership	*Head Start (HS) and General Child Care (GCC) Partnership*	*Head Start (HS) and Family Child Care Home (FCCH) Network Partnership*
Fiscal Description • See "Acceptable Fiscal Approaches" (page 15). A cost-allocation plan *is required* for some types of these partnerships and *may be required* for other types.	**Fiscal Description** • See discussion on enhancement under "Acceptable Fiscal Approaches" (page 16).	**Fiscal Description** • See discussion on enhancement under "Acceptable Fiscal Approaches" (page 16).
Value Added/Strengths of Model • Family needs for full-day services are met. • Families receive comprehensive services. • Curriculum and materials are shared (affordability). • HS training dollars are available to the entire program. • Model facilitates single point of access for service delivery. • Model maximizes use of facilities and other resources. • Model increases options for parents.	**Value Added/Strengths of Model** • Family needs for full-day services are met. • Families receive comprehensive services. • Curriculum and materials are shared (affordability). • HS training dollars are available to the entire program. • Model serves as single point of entry for service delivery. • Model maximizes use of facilities and other resources. • Model increases options for parents.	**Value Added/Strengths of Model** • Family needs for full-day services are met. • Families receive comprehensive services. • HS training dollars are available to the entire program. • Model serves as single point of access for service delivery. • Economy of scale is facilitated. • Model may provide mechanism for additional funding, which may include salary improvements. • Model maximizes use of facilities. • Model increases parental choice in program design. • Services can be provided during nontraditional hours and in nontraditional settings. • Model ensures that child receives quality services in licensed, monitored program.

Head Start (HS) and State Preschool (SP) Partnership	*Head Start (HS) and General Child Care (GCC) Partnership*	*Head Start (HS) and Family Child Care Home (FCCH) Network Partnership*
Challenges of Model • Differences in income eligibility exist. • Group size is capped at a maximum of 20, which increases the financial burden brought about by reduced revenue in SP portion of the program. • Staff qualification differences (Title 5 vs. Title 22) may require HS to pay more staff and may require differing education levels for staff. • Differences in length of child eligibility period exist. • Enrollment vs. attendance definitions may cause confusion. • HS may serve over-income children with disabilities. • Priority differences on eligibility list exist. • Complexity of accounting increases. • Parents may have to duplicate paperwork if partners are separate agencies.	**Challenges of Model** • Differences in income eligibility exist. • Group size is capped at a maximum of 20, which increases the financial burden brought about by reduced state revenues. • Differences between the funding sources on enrollment vs. attendance place an additional burden on earning the GCC contract. • Staff qualification differences (Title 5 vs. Title 22) may require HS to pay more staff and may require differing education levels for staff. • Differences in length of child eligibility period exist. • Priority differences on eligibility list exist. • HS may serve over-income children with disabilities. • Complexity of accounting increases. • Parents may have to duplicate paperwork if partners are separate agencies.	**Challenges of Model** • Differences in income eligibility exist. • Differences in length of eligibility exist. • HS may serve over-income children with disabilities. • Children enrolled in HS may not readily receive child care funding because of a waiting list. • Parents may have to duplicate paperwork if partners are separate agencies. • Employer/employee issue may exist. (Provider may be considered an HS employee.)

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Program Models: What Do They Look Like When Implemented?

The program models described in the matrix on pages 9 through 11 may be implemented in a number of ways. The three examples that follow illustrate possible implementation strategies.

Head Start and State Preschool Partnership,
Type One—Mixing Funds to Operate as a Single Program

In this model, State Preschool (SP) funds half-days for part of the year, typically for 175 days, and Head Start (HS) funds the other half-days for the same part of the year. The funds are mixed in order to provide a seamless, full-day program.

If a full year and/or longer day is needed in the community, funds may come from the following:

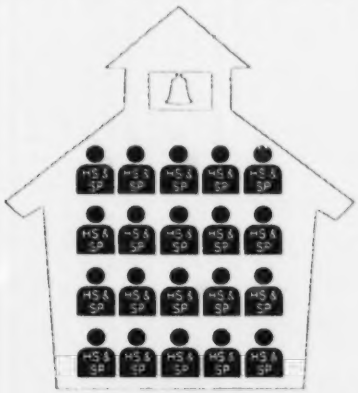
1. Partnership members' other resources
2. Another agency's resources

The mixing of funds in this model can be expressed by the following formula:

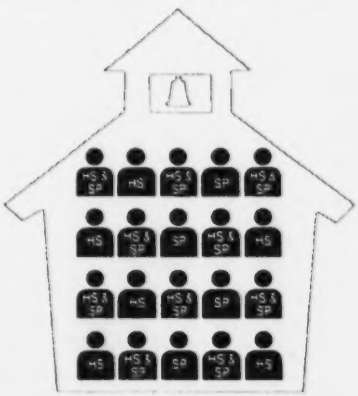
SP (part-year) + HS (part-year) + additional funds = full-day, full-year.

This model is commonly called the "braided," "blended," or "mixed" classroom. All children or only some of the children in the classroom may be Head Start eligible—either situation is acceptable.

A cost-allocation plan is required for this model unless all costs of the two programs are kept separate. See discussion on cost allocation under "Acceptable Fiscal Approaches" on page 15.



20 children, all eligible for HS and SP



20 children, eligible for either HS or SP, or both

Head Start and State Preschool Partnership, Type Two—Head Start and State Preschool Programs Operate Separately

In this model, SP funds half-days for part of the year, typically for 175 days, and HS funds the other half-days for the same part of the year. Each program is operated separately for half of the day. Funds are not mixed into a single fund that pays for the full day of services.

If a full year and/or longer day is needed in the community, funds may come from the following:

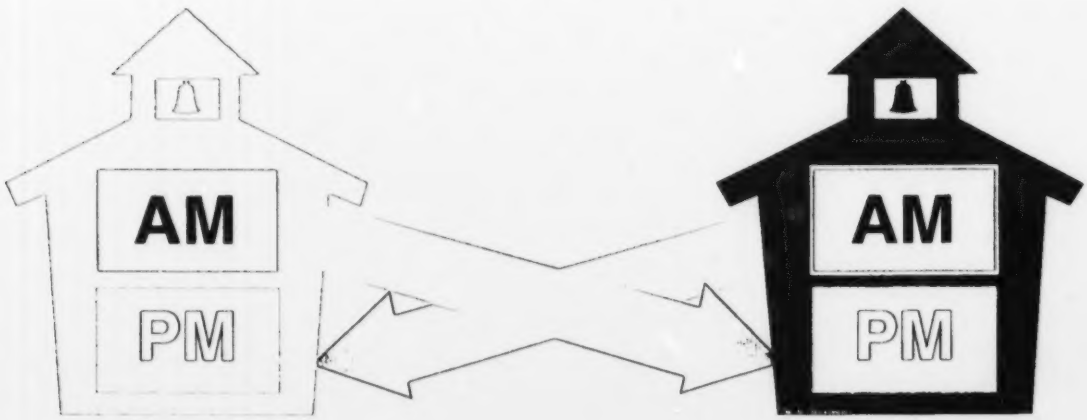
1. Partnership members' other resources
2. Another agency's resources

The operation of separate programs within this model can be expressed by the following formula:

SP (part-year) + HS (part-year) + additional funds = full-day, full-year.

This model is commonly called the "criss-cross" classroom(s). All children must be Head Start eligible.

A cost-allocation plan is not required if operations for Head Start and State Preschool are kept completely separate. A cost-allocation plan is required if any services are mixed (e.g., the teacher is paid with one check for both the Head Start and the State Preschool components).



Note: A guiding principle adopted by the Collaborative Partners Work Group states the following: "The program day appropriately meets the developmental needs of the children." This model conforms to the principle *only if* the Head Start and State Preschool coordinate the daily activities to provide appropriate periods of rest, play, and structured learning experiences.

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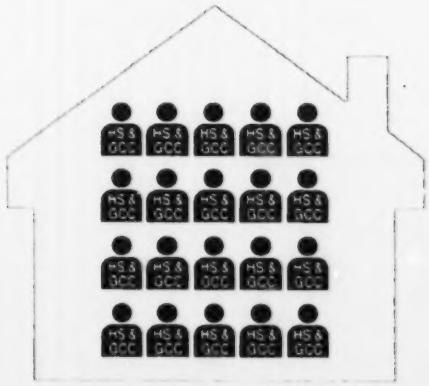
Head Start and General Child Care Partnership, Head Start and Family Child Care Home Network Partnership

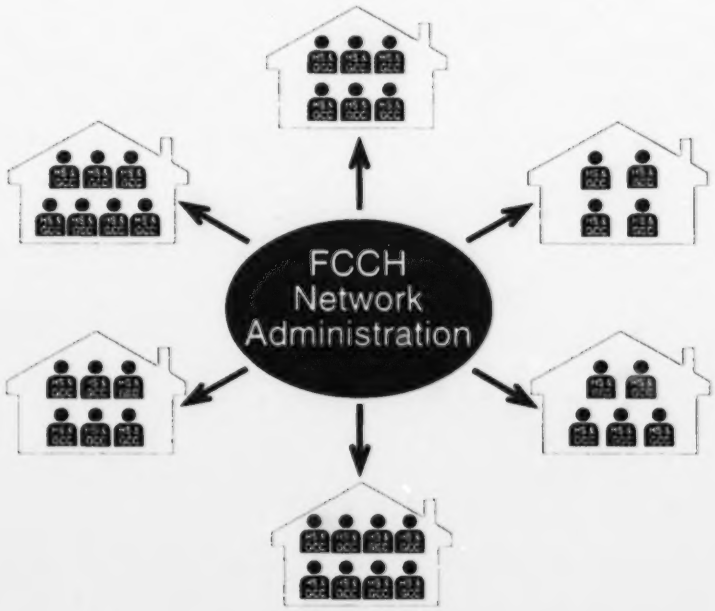
General Child Care (GCC)* provides funds for the full year, typically for 246 days, and for the full day. Head Start provides an "umbrella" of additional services, including comprehensive services for children and families, additional training resources, additional staff and/or materials, and so forth. In this model, all children in each classroom or family child care home (FCCH) participating in the collaboration must be enrolled in State GCC *and* must be Head Start eligible. However, agencies may operate additional classrooms that are not involved in the collaboration for children who do not have dual eligibility and/or enrollment.

Partnerships of this kind may operate as a single program with mixed funds or may operate with funds and services separately accounted for by each partner agency.

This model is commonly called the "umbrella" or "enhancement" model.



Center-Based Example



FCCH Network Example

Note: No cost allocation plan is required for these models.

* For purposes of this model, "General Child Care" includes Migrant, Campus, and other variations of Center-based Child Development Division-funded early care and education programs.

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Acceptable Fiscal Approaches

Most fiscal approaches in partnerships fall into one of two broad categories: Cost Allocation and Enhancement. Both categories are described in this section.

Cost Allocation

In this approach, the agencies establish a cost allocation base, such as the number of enrollment slots available or the hours of service provided each day by each partner.

The costs of operating each classroom are collected separately. Total classroom costs are then distributed to each program, based on a percentage derived from the agreed-upon allocation base.

> ***Example:*** A classroom is providing full-day, full-year services to children who are coenrolled in a State Preschool program and Head Start. Ou[illegible]he 10 hours of operation each day, 3[illegible] hours are chargeable to the State Preschool program, with the other 6.5 hours charged to Head Start. Therefore, 35 percent (3.5hrs/10 hrs) of the costs of the classroom are chargeable to the state, with the remaining 65 percent chargeable to Head Start.

Cost Allocation Plan: The cost allocation plan should be the simplest, most straightforward way of allocating costs fairly. For example, *ACYF-IM-HS-01-06** states that programs should use the *aggregate* of all costs of the agency's program, as contrasted with using multiple cost allocation schemes.

In accordance with *ACYF-IM-HS-01-06,* the cost allocation plan must distribute costs equitably to the various programs involved as follows:

- A cost may be allocated to a particular cost objective if the goods or services involved are chargeable or assignable to that cost objective in accordance with the relative benefits received.
- There must be a way to reasonably establish the basis for the allocation, such as agency or classroom schedules or prior-year reports.
- Head Start's share of the collaboration budget is determined by the cost allocation plan, not by the quantity or percentage of Head Start dollars going into the total budget.

Some costs are judged to be allowable by only one of the programs (e.g., a cost is allowed by Head Start but considered to be nonreimbursable by the state child development contract).

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* An *Information Memorandum* issued by the Head Start Bureau.

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Such costs should be charged directly to that program and should not be involved in the cost allocation plan, as follows:

- Cost allocation plans are required in some cases in order to make clear which of two or more programs is to pay for particular services *(ACYF-IM-HS-01-06)*.
- Equipment and nonconsumable supplies need not be allocated between the programs as long as Head Start is the predominate source of funding for the activity and the collaboration partner program is another federally funded child care program.

Enhancement

In this approach, the state child care funds are used to provide the full-day hours of operation, with Head Start funds used to "enhance" the program and to cover any additional operating costs. The relationship would be explained in the Head Start grantee's federal application, and the state contractor would report to the state all costs of the program, with the Head Start funds reported as "restricted." No cost allocation plan is required to distribute enhancement costs in this approach.

Example: A full-day state child care contract agency is approached by a Head Start program interested in providing additional services to the child care program's Head Start eligible children. The Head Start program "enhances" the state contractor's program by providing funds associated with meeting Head Start Performance Standards for all Head Start eligible children.

It should be noted that the State General Child Care program is required to provide full-day services in accordance with the needs of the children and families served. If there were a need to increase or decrease the hours of operation beyond current operations to meet child and family needs, the program would need to seek state approval to amend the approved program description in its funding application.

Head Start funds may be used to pay specific costs (e.g., equipment, curriculum, specified facility costs, an additional teacher in the class), or Head Start funds may be used as tuition or a stipend for a child enrolled in the child care program. In the latter case, the contract between Head Start and the child care program must identify the services being provided in return for the tuition or stipend.

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Fiscal Requirements and Guidance

Collaborations involving Head Start and CDE/CDD early care and education programs must meet state *and* federal requirements. State requirements include, but are not limited to, contract funding terms and conditions, and applicable *California Code of Regulations,* Title 5 and/or Title 22, regulations. Federal requirements include the Head Start Performance Standards and other statutory and regulatory requirements. Agencies considering partnerships should become familiar with the essential fiscal and program requirements of their potential partner agencies. A summary of selected federal and state requirements and other guidance applicable to collaborations is provided in this section. The information is intended to provide general guidance for using state and federal funding sources; it should not be considered comprehensive in scope.

State Requirements and Guidance

State programs are funded through contracts between local agencies and the California Department of Education. Center-based (State Preschool and center-based child care) contract reimbursement is limited to the amount which is the least of the following:

- The total contract amount (known as the maximum reimbursable amount, or MRA);
- The net reimbursable program costs for subsidized children minus subsidized family fees and accrued interest; or
- The daily contract rate multiplied by the adjusted child days of enrollment of subsidized children minus subsidized family fees and accrued interest.

Alternative payment programs (APPs) do not operate centers or family child care home networks directly. Rather, they provide subsidies to eligible families through a voucher that the parents may present to the provider they choose. In addition to licensed settings, families may use their vouchers in licensed-exempt care, both in and out of their own home. Head Start programs may serve families receiving APP services in a variety of ways. For example, they may enroll Head Start eligible families in a traditional, part-day Head Start program, with the APP providing a voucher to the APP-enrolled family for the remainder of the day. Or the Head Start program may provide additional services to Head Start eligible families who are already receiving full-day, full-year services in home-based settings through the APP.

APP reimbursement is limited to the maximum rate established by the Regional Market Rate (RMR) Survey for the appropriate county and to the type and length of care provided. Additional support services, defined as those services that help promote the healthy physical, mental, social, and emotional growth of the children and families, may also be provided by the APP. An APP "earns" a contract with CDE by providing net reimbursable program costs with specified limits on administrative and support costs.

If a program fully covers the basic operations of the facility (personnel, building occupancy costs, basic household supplies, and so forth) with the voucher, the Head Start program may supplement the funding to increase quality. In such a case, the Head Start program is not required to account to the state for the funds.

Federal Requirements and Guidance

Head Start programs are funded through grants to local agencies from the U.S. Department of Health and Human Services. Requirements and guidance applicable to partnerships include, but are not limited to, the following:

- As long as cost-sharing arrangements are worked out in advance and are reflected in the agency's approved Head Start grant application, no procedures will be necessary to separate the Head Start costs from other costs (*ACYF-IM-HS-01-06*). If the other source is a state program, a cost allocation for shared classrooms may still be required to support actual costs chargeable to the state. This is the case if the collaboration is with a program that does not allow equal proration of slots, such as a State General Child Care program.
- Any changes or deviation from the approved budget should be brought promptly to the attention of the federal funding official, and a request for a program amendment should be submitted.
- When reimbursement (in the form of vouchers or other mechanisms) covers only part of the cost of providing an allowable service, Head Start funds may be used for the balance of the cost (*ACYF-I M-HS-01-06*). In such a case, no cost allocation plan is required.
- When a staff member in a jointly funded position works primarily for Head Start (i.e., the salary paid by Head Start is 51 percent or more), that position must be approved by the Head Start Parent Policy Council.
- Early care and education/childcare is an allowable cost for Head Start.
- Early care and education/child care services to children who are not Head Start eligible must be charged exclusively to other sources.
- No fees may be charged for Head Start services. However, a partner—either the Head Start grantee or another partner—may collect fees for non-Head Start services.

Technical Assistance Resources

The following additional resources may be of interest to programs entering into partnerships.

- *Collaborative Partners: California's Experience with the 1997 Head Start Expansion Grants* was produced by the California Head Start–State Collaboration Office and published by the California Department of Education in 1999. This document may be downloaded at the Web site <*www.cde.ca.gov*> (scroll to "Head Start Collaboration") or ordered from the California Department of Education, CDE Press Sales Office, 800-995-4099 (toll-free).
- The Head Start Bureau has a number of Information Memorandums regarding collaboration available at its Web site: <*www.acf.dhhs.gov/programs/hsb*>. Of particular interest is ACYF-IM-HS-01-06, *Considerations for Grantees with Multiple Sources of Funding.*
- *Child Care and Head Start: Incentives, Challenges, and Models for Successful Collaboration* was prepared by Monica Rohacek for the Los Angeles County Child Care Planning Committee. For information call the Los Angeles County Office of Child Care at (213) 974-4103.
- Quality in Linking Together (QUILT) is a training and technical assistance project funded by the Head Start Bureau and the Child Care Bureau. The project's goal is to foster and support partnerships among child care, Head Start, prekindergarten, and other early education programs. Its Web site address is <*www.quilt.org*>; its toll-free telephone number is 877-867-8458.
- *Braided Funding—Frequently Asked Questions and Answers* was produced by the Community Development Institute in collaboration with the Region VIII Head Start Quality Improvement Center and QUILT in 2001. The document can be viewed at the Region VIII Head Start Web site: <*www.region8headstart.org/news*> under "Resources from Region VIII and Head Start Conferences."

Appendix A

DEPARTMENT OF HEALTH & HUMAN SERVICES

Administration for
Children & Families

Pacific Hub
50 United Nations Plaza
San Francisco, CA 94102

Refer to:

November 21, 2000

Dear California Head Start Director:

The purpose of this letter is to provide guidance and clarification to California Head Start grantees with regard to income eligibility for families enrolled in the Federal Temporary Assistance for Needy Families (TANF). As you know, ACF Program Instruction dated July 29, 1999 (Log No. ACYF-PI-HS-99-06) provided national guidance to all Head Start grantees for determining Head Start eligibility of families enrolled in public assistance. The Program Instruction stipulates that:

> A low income family is a family whose income before taxes is below the poverty line or a family that is receiving public assistance, even if the family's income exceeds the poverty line...Public assistance means that the family is receiving benefits or services through the TANF or SSI programs.
>
> In determining a family's Head Start eligibility, grantees should consider a family as receiving public assistance if the family is receiving benefits or services, funded under the authority of the TANF program, which are being provided on a regular basis. Some of the types of services, which would be considered as TANF benefits or services include...subsidized child care and employment related services.

In California, the State administers the TANF program through its California Work Opportunity and Responsibility to Kids (CalWORKs) program. Recipients of CalWORKs child care services are identified as being in one of three stages: Stages One and Two are designed to assist recipients who are being provided with assistance and/or transitioning off aid due to employment. Stage Three is designed to provide child care subsidies for CalWORKs recipients who are no longer receiving aid, however, eligibility for these services is contingent on their being CalWORKs eligible. In this sense, these recipients can still be considered CalWORKs recipients for purposes of being eligible to receive Head Start services even if the family's income exceeds the poverty line.

We hope this clarification is helpful as it appears there is still some confusion about this. Please feel free to contact your assigned program specialist if you have any further questions.

Sincerely,

Jan Len, Director
Children & Youth Development Unit

Enclosure

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration on Children, Youth and Families	
	1. Log No. ACYF-PI-HS-99-06	2. Issuance Date: 7\29\99
	3. Originating Office: Head Start Bureau	
	4. Key Word: Public Assistance and Head Start Eligibility	

PROGRAM INSTRUCTION

TO: Head Start Grantees and Delegate Agencies

SUBJECT: Receipt of Public Assistance and Determining Eligibility for Head Start

LEGAL AND RELATED REFERENCES:

The Head Start Act, as amended, 42 U.S.C. 9831 et seq.
45 CFR 1305, Eligibility, Recruitment, Selection, Enrollment and Attendance in Head Start.

BACKGROUND:

Section 645(a) of the Head Start Act states that "children from low-income families shall be eligible for participation in programs assisted under this subchapter if their families' incomes are below the poverty line, or if their families are eligible ... for public assistance." Historically, Head Start defined families eligible for public assistance as those who were receiving payments through the AFDC program (Aid to Families with Dependent Children) or through the SSI program (Supplemental Security Income). With welfare reform and the passage of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, AFDC has been replaced by the TANF program (Temporary Assistance for Needy Families). This Instruction clarifies the issue of what constitutes TANF eligibility for purposes of determining eligibility for Head Start.

INSTRUCTION:

For a child to be eligible for Head Start services, Head Start grantees must verify that the child meets the requirements regarding age and be from a "low-income" family. (Alternatively, grantees may enroll the child as part of the enrollees who can be from "over-income" families, as allowed by 45 CFR Part 1305 and, if applicable, by Section 645(a)(2) and (d) of the Head Start Act.). A low-income family is a family whose income before taxes is below the poverty line or a family that is receiving public assistance, even if the family's income exceeds the poverty line. (Children in foster care are also Head Start eligible, regardless of family income.) Public assistance means that the family is receiving benefits or services through the TANF or SSI programs. (Before the passage of TANF in 1996, public assistance meant that a family was receiving benefits through AFDC or SSI.)

TANF is in many ways a much more complex program than AFDC because States have great flexibility in determining the types of benefits they provide to participating families. This may make the issue of deciding who is and who is not to be considered a TANF recipient more difficult than it was under AFDC.

In determining a family's Head Start eligibility, grantees should consider a family as receiving public assistance if the family is receiving benefits or services, funded under the authority of the TANF program, which are being provided on a regular (i.e., not episodic) basis. Some of the types of services which would be considered as TANF benefits or services include, but are not necessarily limited to, cash payments, vouchers and other forms of benefits designed to meet the family's ongoing basic needs, supportive services such as transportation, subsidized child care and employment-related services such as job training.

All Head Start programs should become familiar with their State and/or county TANF program to help facilitate the process of determining eligibility for Head Start.

Questions on this matter should be referred to your ACF Regional Office or, as appropriate, the American Indians or Migrant Programs Branches.

Patricia Montoya

Patricia Montoya
Commissioner
Administration on Children,
Youth and Families

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DELAINE EASTIN
State Superintendent of Public Instruction

Department of Health & Human Services
Administration for Children & Families
Pacific Hub

MAR 20 2001

To: **California Head Start Grantees and Delegates**
California Department of Education, Child Development Division Contractors

Regarding: Partnership Opportunities for Grantees and State Contractors

The Administration for Children and Families (ACF), Region IX Office and the California Department of Education, Child Development Division (CDD) are pleased to send you this joint memorandum to:

- Inform you of upcoming funding and partnership opportunities to bring together federal, state and local resources to provide full-day, full-year early education services to low income families.
- Share technical assistance resources to assist in the development of partnerships.

Funding Opportunities

The federal fiscal year 2001 appropriation provides the single biggest funding increase in Head Start's history. Of the $933 million increase nationwide, a total of $285.4 million is available to increase enrollment in preschool Head Start programs. California will receive approximately $35.9 million (12.5%) of this amount. Applications for Head Start program expansion will be due to the ACF Regional Office by June 1, 2001.

The federal fiscal year 2001 appropriation also provides the biggest increase ever — over $817 million nationally — in additional discretionary Child Care Development Fund (CCDF) monies to states for child care assistance for low-income families. California has been allocated $95.7 million (11.7%) of this funding.

This new federal funding, combined with state early care and education funding (i.e., State Preschool; various child care and development programs including center-based, family child care home networks, and Alternative Payment Programs; and other sources including the California Children and Families Commission) represent tremendous

opportunities for providing quality services through partnerships. At the federal level, the ACF Head Start and Child Care Bureaus have been working to ease barriers to partnerships that utilize both Head Start and child care funding. This joint memorandum is one of a number of activities and products the ACF Region IX office, CDD, the California Head Start-State Collaboration Office (CHSSCO) and California Head Start Association (CHSA) have engaged in and produced to support partnership efforts. These include:

- The *Collaborative Partners Report*, published by the CHSSCO in 1999, that describes collaborative models utilized by agencies around the State, as well as barriers to collaboration and successful local strategies to ease those barriers. The report may be viewed and downloaded at the CHSSCO website at www.cde.ca.gov (then scroll to "Head Start Collaboration").

- A series of statewide *Roundtables* sponsored by the CHSA in 1998 and 1999. These forums brought together Head Start programs, ACF Region IX and CDD staff to discuss barriers to collaboration and possible solutions.

- *Questions and Answers* regarding partnerships, a 1999 CDD memorandum of answers to questions, issues and barriers compiled from the Roundtables, produced by ACF Region IX, the CHSA, CHSSCO and the CDD.

- The *Collaborative Partners Work Group* (CPWG) formed by the CDD to develop guidance regarding acceptable partnership models. The CPWG membership includes Head Start grantees, CDD contractors, and state and federal staff. The recommendations on full-day models developed by the CPWG are being compiled into a report that will be available to the field in the near future.

- The ACF Region IX Office advisory letter to grantees and delegates developed with input from the CHSA and CHSSCO. The letter, dated November 21, 2000, clarified that families enrolled in the California Work Opportunity and Responsibility to Kids (CalWORKs) program in any of the three Stages are eligible to receive Head Start services even if family income exceeds the federal poverty level.

Guidance for Partnerships

ACF Region IX and the CDD agree on several key elements of successful partnerships that utilize Head Start and state early care and education funding:

1. Where federal and state rules or regulations differ, partnerships ***shall*** ensure the requirements of both programs are being met.

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2. Programs are ***encouraged*** to reduce redundancy when program requirements are similar. For example, CDD and Head Start each require two parent/teacher conferences per year. A partnership program may convene two, rather than four such meetings.

3. All partnerships ***shall*** clearly demonstrate a "value added" component. The combination of funding streams or programs must result in more program availability (such as more hours per day or days per year of services) and/or additional services to the children and families served.

4. All partnerships ***shall*** have defensible cost allocation plans.

ACF Region IX and CDD are committed to continuing to work together to reduce the number of conflicting requirements that hamper full-day, full-year partnerships. Questions regarding this memorandum should be directed to Michael Zito, Coordinator of the CHSSCO, at 916/323-9727 or mzito@cde.ca.gov, or Susan Honciano, State Collaboration Office Liaison, ACF Region IX, at 415/437-8065 or shonciano@acf.dhhs.gov. Head Start or CDD program questions should be directed to the appropriate ACF Region IX Program Specialist or CDD Field Services Consultant, listings of which are also included.

Kathy Lewis
Deputy Superintendent
Child, Youth and Families Services Branch
California Department of Education

Sharon M. Fujii
Pacific Hub Director
Administration for Children
and Families

Enclosures:
ACF Region IX Program Specialists
CDD Field Services Consultants

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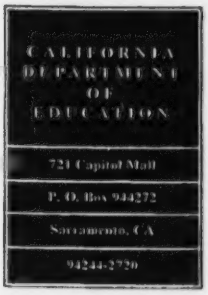
Appendix C

DELAINE EASTIN
State Superintendent of Public Instruction



December 30, 1999

To: California's Child Care and Development Programs and Head Start Programs

From: Michael Silver, Director
California Head Start-State Collaboration Office

Subject: **QUESTIONS AND ANSWERS ON HEAD START AND STATE CHILD CARE AND DEVELOPMENT PROGRAM FULL-DAY, FULL-YEAR PARTNERSHIPS**

Early education programs across the nation are working hard to meet families' increasing needs for full-day, full-year child care. In California, Head Start and state funded child care and development programs have been forging partnerships to better utilize scarce resources and meet these needs. The California Head Start-State Collaboration Office (CHSSCO) has been working closely with leaders in the early education community and federal and state agencies to give local agencies the tools they need to minimize barriers to these partnerships. For example, the *Collaborative Partnerships Report* has just been published and is being mailed to all Child Development Division (CDD) funded programs and Head Start grantees and delegates. A task group of Head Start, child care and development programs, and CDD representatives has just begun meeting to discuss appropriate models and how to ease barriers. This memorandum is also intended to answer some questions programs have been asking about such partnerships.

The following questions and issues were generated at a forum of Head Start agencies regarding partnerships for full-day, full-year services. The CDD and the U.S. Department of Health and Human Services, Administration for Children and Families, Region IX, agreed to respond to as many of the questions and issues as possible. The answers below were drafted and reviewed by the CDD and Region IX with the assistance of the California Head Start Association and the CHSSCO. We hope you find this information helpful in your collaborative activities.

CDD funded programs should contact their assigned field services consultant with any questions about the information in this document. Head Start programs should contact their Region IX program specialist.

Program Questions

1. **Who is eligible for State Preschool Services (SPS)? Head Start (HS) income eligibility is different. The difference in income eligibility is 13% between federal and state guidelines.**

Region IX: SPS and HS children can be in the same classroom regardless of income.

CDD: Pre-kindergarten children ages three to five at the time of enrollment are eligible for SPS. Except for Child Protective Services (CPS) children, the family's adjusted monthly income cannot exceed the income ceilings established by the California Department of Education at the time of enrollment. Income ceilings are based on the State Median Income (SMI) for a four-person household that is determined by the Department of Finance. For State Fiscal Year 1999-00, this figure is $50,148 per annum. SPS income ceilings are approximately 60 percent of SMI depending on household size and for a four-person household the ceiling is $36,312. In contrast, Head Start derives its family income guidelines directly from the U.S. Census Bureau poverty statistics. For federal fiscal year 1999, a four person Head Start household's income ceiling is $16,700 per annum. Relative to SPS for the same household size, Head Start is approximately 30 percent of SMI.

2. **Wrap around: SPS in the morning only/Head Start in the afternoon. Must get a waiver if you want Head Start in the morning.**

Region IX and CDD: Head Start classes can occur anytime, AM or PM, even at night to accommodate working parents. This is the same for SPS.

3. **HS certifies for the year; SPS full-day certifies only if family is employed.**

Region IX: HS children are eligible for HS for two years.

CDD: SPS children are certified for one school year. All eligible Child Protective Services (CPS) and 4-year olds are admitted before eligible 3-year olds. A 3-year-old that was admitted one year will not automatically be a priority the next year and will have to compete with the other 4-year old applicants. There is no employment requirement for part-day SPS.

Full-Day SPS and General Child Care (GCC) have the same requirements and a certification period may be up to a year before a recertification must occur. However, both need and eligibility must be established and maintained for as long as services provided. A basis of need (employment, seeking employment, training, incapacity, or homelessness) must exist for the parent, or each parent, to cover the hours of service unless the child has a qualifying medical or handicapping condition or is receiving CPS. For eligibility the family must continue to be: (1) on TANF, (2) be income eligible, or (3) the child is receiving CPS. Once the basis of need or eligibility ends, the child is terminated from the program.

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4. **Can children in HS nap?**

Region IX: HS children may nap.

5. **Doesn't blending HS and SP lead to a loaded curriculum program twice a day with no nap?**

Region IX and CDD: A full-day program is not intended to be full-day of intensive curriculum. Moving to full-day services does not mean you get two, ½ day Head Start type experiences per day. It does mean programs should provide a full day of appropriate developmental curriculum which includes periods of play, nutrition, and rest.

6. **Over Income (OI): SP up to 15% of capped max; HS 10% OI no income max cap-implication for children with disabilities.**

Region IX: Although some HS programs reserve their 10% over income for children with disabilities, HS programs are free to set their own priorities based on local needs.

CDD: In accordance with Title 5, Section 18133, if no eligible children are on the waiting list, the contractor may enroll children who are not otherwise eligible for participation. This includes children who exceed the age limitations and children from families who income exceeds the current income ceilings issued by the CDE by fifteen (15) percent or less of the adjusted monthly income for income eligible families of the same size. These children cannot comprise more than ten (10) percent of total enrollment.

7. **HS requires home visits; SP requires Parent Conferences and parents have to do both.**

Region IX and CDD: An increase in parent contacts is viewed as an increase in opportunities to better involve parents in the care and education of their own children, and as a means to provide services to the entire family. Programs may wish to consider options such as conducting parent conferences during home visits.

8. **Head Start has one-time certification. GCC re-certification necessary every time income changes or there is a new family member. GCC can be found no longer income-eligible.**

Region IX comment: See earlier reference on Head Start eligibility.

CDD: see #3 above.

9. Home visiting still a concern, particularly with full day.

Region IX: Head Start must adapt to family needs and schedules.

10. GCS/CCDBG – earned daily reimbursement for attendance. Head Start pays whether the child is absent or not. Need local discretion for defining absence (excused) which is reimbursable.

CDD: State funded programs can claim reimbursement for children either in attendance or with excused absences. Absences may be excused for the illness of the child or parent, a family emergency, court ordered visitations, or 10 days that are in the best interest of the child. Local agencies have the flexibility to define when it would be in the best interest of the child to be somewhere other than the center. Anyone wishing to change this provision should consider contacting a legislator.

11. Head Start age group 3-5; child care serves 2.5-5. To collaborate with Head Start, have to go to 3-5 age group leaving previously served 2.5 year olds unserved.

Region IX and CDD: Programs receiving Early Head Start funds can serve infants and toddlers as well as pregnant mothers. Programs receiving state funds may use part of those funds to serve the children between 2.5 and 3 years, if needed.

12. Paradox – Certificate program and parent choice. How can two organizations have an agreement when the third party "parent" has the choice?

CDD: "Parental choice" is a federal requirement for states receiving child care block grant funds. States must ensure that the parents of an eligible child who receives or is offered child care services is offered a choice of providers, with the provider selected by the parent "to the maximum extent practicable" (45 CFR Sec. 98.30). California's State Plan for the federal Child Care and Development Fund states that each local resource and referral agency "provides counseling on how to select a child care provider that best meets the family's needs and a list of providers that the parent should visit".

California's resource and referral agencies have the responsibility to educate parents on how to choose child care, not tell them which programs are best for them. We believe that parent choice requirements are reasonable, and are consistent with Head Start's strong parent support component.

While meeting their parent choice obligations does mean that a resource and referral agency may not steer parents to one program at the expense of all others, this should not preclude partnerships that offer parents a quality, full-day option that meets their needs from being successful.

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13. Tremendous waiting list already in existence for Alternative Payment – having to address Head Start partners who want Head Start enrollees to go to top of the list.

CDD: None of CDD's center-based or alternative home-based programs may allow participation in Head Start, by itself, to be a priority. Since these priorities were established by the state legislature, legislative action is required to change the priorities.

Fiscal/Funding/Contract Questions

1. Timing of when money comes down from Head Start.

Region IX: Program year beginning dates can be modified if requested. However there must be a balance in funding actions throughout the year due to federal workload levels.

Questions That Are Both Program and Fiscal

1. Reimbursement rates – There is a disparity between salary rates in Head Start and SPS programs.

Region IX and CDD: Head Start programs historically receive higher funding per child than state programs. However, all salaries, Head Start and state, are locally established and are based on wage comparability for the service area. Programs that blend funding from both sources may be able to equalize salaries.

2. Class size is a problem: SPS allows 24; Head Start allows a maximum of 20.

Region IX: Federal regulations at 45 CFR 1306.32(a)(1), (2), (3), (4), (5) and (6) require Head Start programs to determine class size based on the predominant age of the children who will participate in the class. For classes serving predominantly four or five years of age children, the average class size must be between 17 & 20; but for double session classes that serve the four to five year old age group, the average class size must be between 15 & 17.

For classes serving predominantly three years of age children, the average class size must be between 15 & 17; but for double session classes that serve three year old age group, the average class size must be between 13 & 15.

3. There is too much paperwork and it is all different.

Region IX and CDD: Annual reviews of paperwork needs may often result in elimination of some requirements, as well as consolidation and refinement of others.

4. **Market rate Alternative Payment significantly over other state funded programs. These other programs may not have to meet quality standards. Also, center-based care is substantially lower funded than Alternative Payment. In rural areas, the market rates can be less than current rate needed.**

CDD: California uses two funding mechanisms for determining cost reimbursement in state-funded programs. Most center-based programs are funded under a statewide Standard Reimbursement Rate (SRR) whereas Alternative Payment Programs use a Regional Market Rate (RMR). While it is true that in some communities the SRR is lower than the RMR, in other communities the opposite is true. These differences can present barriers when parents using the Alternative Payment system wish to obtain certificates for care in state-funded programs. CDD will be exploring options for eliminating those

barriers. Regarding quality standards, the driving force behind Alternative Payment Programs is parental choice. Resource and Referral programs, and consumer education campaigns such as "Care About Quality", are being funded by CDD as a means of further educating parents about how to identify, seek, and demand quality programs for their children.

5. **Issue of parents needing a full day program but Head Start is often still a part day. Partnering with Head Start can save Alternative Payment money.**

Region IX and CDD: Yes, partnering with Head Start can save money while meeting parent need for full day services.

6. **Creative strategic funding needed. County/DSS cannot fund the number of children who will be or are in need.**

Region IX and CDD: Local Child Care and Development Planning Councils (LPCs) should identify the universe of services available for blended funding to maximize resources. Partnerships do not refer only to federal and state sources of funding. Local funding, foundations, Proposition 10 funds, etc. should also be explored.

Other Questions

1. **Income issues same as SPS implications for Head Start enrollee with disabilities who can be served in Head Start model, but not SPS or GCC.**

CHSA: Difference with income eligibility for special needs children over-income.

CDD: Difference in eligibility criteria for children with disabilities may prohibit collaboration in some instances. Head Start can serve over income children with disabilities, but SPS cannot.

2. **Family Child Care Home Provider. Problem of what Head Start demands and what offering Head Start has for child care home provider.**

Region IX: Question not specific enough to answer. In general, Head Start offers recruitment, training, health, social and administrative support services to augment Family Child Care Home Providers.

3. **Case management blended model with parent choice model needed. This is a systems problem. Need mechanism to come together to address what is not working.**

CHSA: Comprehensive services can be added to parent choice models.

CDD: If parents don't choose your program, you can still collaborate with provider and parent (e.g., one Head Start agency is working with exempt providers to provide training and comprehensive services.)

4. **CalWORKs participants that can't find work and have to do community work – reimbursement will not be enough to cover the actual care needed by families.**

CHSA: This is not true, child care is guaranteed.

CDD: Amount of care required by a CalWORKs recipient is provided within CalWORKs child care regardless of whether the parent is in a salaried job, an approved training program, or in community work.

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